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11 *Attorneys for Defendant, Navigators Specialty Insurance Company*

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 SARONIC INVESTMENTS, LLC, A Nevada
15 Limited Liability Company,

16 Plaintiffs,

17 vs.

18 THE NAVIGATORS GROUP, INC. dba
19 NAVIGATORS INSURANCE COMPANY,
20 a wholly owned subsidiary of THE HARTFORD,
21 and DOES I-X, inclusive,

22 Defendants.

Case No.:

PETITION FOR REMOVAL

23 **TO: THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA:**

24 PLEASE TAKE NOTICE that Defendant Navigators Specialty Insurance Company
25 (“Navigators”), incorrectly identified in the Complaint as The Navigators Group, Inc. dba
26 Navigators Insurance Company, a wholly owned subsidiary (*sic*) of the Hartford, hereby removes
27 this action to the United States District Court for the District of Nevada (the “District Court”),
28 from Nevada’s Second Judicial District Court in and for Washoe County (“State Court”), pursuant
to 28 U.S.C. §§ 1332, 1441(b) and 1446.

1. Plaintiff Saronic Investments, LLC (“Saronic”) initiated this action on November
18, 2024 in State Court as Case No. CV24-02613. Saronic named Navigators as a Defendant in
both its initial Complaint and its Amended Complaint filed on January 14, 2025. A true and correct

1 copy of the Amended Complaint (“FAC”) is attached hereto as **Exhibit 1**.

2 2. This Court has jurisdiction over the instant action pursuant to 28 U.S.C. § 1332(a)
3 because: (i) this action is a civil action pending within the jurisdiction and territory of the United
4 States District Court for the District of Nevada; (ii) the action is between citizens of different states;
5 (iii) the amount in controversy exceeds the sum of \$75,000, exclusive of interest and costs; and
6 (iv) all procedural requirements for removal are met.

7 3. **There is Complete Diversity of Citizenship Here.** Saronic alleges that it was at
8 all times relevant, a limited liability company with its principal place of business in Reno, Nevada
9 and is therefore a citizen of Nevada. (FAC at ¶ 1-2). Navigators is a New York corporation with
10 its principal place of business in New York. Thus, it is a citizen of New York for the purposes of
11 jurisdiction. Accordingly, there is complete diversity of citizenship between and among the
12 Parties.

13 4. **Consent to Jurisdiction.** Removing defendant, Navigators, is the only named
14 defendant in this action.

15 5. **The Amount in Controversy Exceeds \$75,000.** Saronic seeks monetary relief in
16 this action. Saronic alleges that it was the owner of a motel in Reno, Nevada, that suffered
17 significant damage that made the lobby and many rooms unsafe and uninhabitable after a car ran
18 into a nearby electrical pole and caught fire. (FAC at ¶ 4-8). Saronic contends that at the time of
19 the accident, it was the insured under a policy of insurance issued by Navigators, which includes
20 coverages for property damage and loss of income. (FAC at ¶ 10-11). Saronic claims the damage
21 to the motel is over \$2.6 million with ongoing repair costs still being determined, and lost business
22 income of more than \$1.9 million, (FAC at ¶ 9) and that Navigators has only paid \$496,337.95,
23 \$50,000.00 of which was for lost income (FAC at ¶ 12). Saronic is also seeking punitive damages
24 in excess of \$15,000, and attorney’s fees and costs in an unknown amount. Accordingly, the
25 amount in controversy exceeds \$75,000.

26 6. **Removal is Timely.** The operative FAC was filed on January 14, 2025. Navigators
27 accepted service of the FAC on January 15, 2025. Thus, this notice of removal is timely filed
28 within the 30-day period prescribed by 28 U.S.C. § 1446(b)(1), and less than one year after the

1 action was initiated, as required by 28 U.S.C. § 1446(c)(1).

2 7. **Notice to the State Court and All Adverse Parties.** Navigators will give notice
3 of this removal to all adverse parties in the action and to the State Court promptly after the filing
4 of the instant Notice of Removal, in compliance with the requirements of 28 U.S.C. § 1446(d).

5 8. **All Pleadings from the State Court Action Have Been Attached.** The only
6 pleadings from the State Court Action are attached hereto as **Exhibit 2**.

7 9. **This Notice Complies with Fed. R. Civ. P. 11.** This Notice of Removal is hereby
8 signed pursuant to Fed. R. Civ. P. 11(a).

9 10. Accordingly, because Navigators has complied with all applicable terms of 28
10 U.S.C. § 1446, it hereby removes this action in intervention from the State Court to the District
11 Court, and hereby requests that further proceedings be conducted in the District Court as provided
12 by law.

13 DATED this 11th day of February, 2025.

14 WRIGHT, FINLAY & ZAK, LLP

15 /s/ Darren T. Brenner

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23 *Insurance Company*
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CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b) and Electronic Filing Procedure IV(B), I certify that on 11th day of February, 2025, a true and correct copy of the foregoing **PETITION FOR REMOVAL** was transmitted electronically through the Court's e-filing electronic system to the attorney(s) associated with this case.

/s/ Jason Craig

An Employee of WRIGHT, FINLAY & ZAK, LLP

EXHIBIT LOG

Exhibit 1	Amended Complaint
Exhibit 2	All filings from case CV24-02613